

EXHIBIT D

Kwan, Adrian

From: Pio Suh <suh@ipcom-munich.com>
Sent: Wednesday, June 26, 2019 12:31 PM
To: Kwan, Adrian
Cc: Akerley, Stephen; Ducker, Philip; Igor Kurtes
Subject: WG: Proposal
Attachments: Docket 001 - Complaint and Exhibits.pdf

Importance: High

FYI

Von: Kathryn Tsirigotis <ktsirigotis@lenovo.com>
Gesendet: Freitag, 15. März 2019 18:53
An: Pio Suh <suh@ipcom-munich.com>
Cc: Kathryn Tsirigotis <ktsirigotis@lenovo.com>
Betreff: Proposal
Priorität: Hoch

*WITHOUT PREJUDICE AND FOR SETTLEMENT PURPOSES ONLY
Subject to FRE Rule 408*

Pio,

As a follow-up to my email from yesterday providing Lenovo's FRAND offer for a license to ICom's patent portfolio, attached is a copy of a complaint that we have filed against ICom in the Northern District of California. In the event that we are unable to agree upon FRAND terms consistent with the ETSI IPR Policy, Lenovo has asked the court to determine the FRAND licensing terms and rates for the parties. I want to reiterate, however, that Lenovo remains a willing licensee and we hope to finalize an agreement with ICom on FRAND terms in the near future. I look forward to hearing from you.

Best regards,
Kathryn

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